

# Exhibit K

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF HUMBOLDT

CARLA ALLEN, )  
)  
Plaintiff, )  
)  
vs. ) CASE NO. DR180132  
)  
BRENNTAG NORTH AMERICA, )  
INC.; (sued individually )  
and as successor-in-interest )  
to MINERAL PIGMENT )  
SOLUTIONS, INC., and as )  
successor-in-interest to )  
WHITTAKER, CLARK & )  
DANIELS, INC.), et al., )  
)  
Defendants. )  
\_\_\_\_\_ )

DEPOSITION OF  
WILLIAM E. LONGO, PhD

September 14, 2018  
11:30 a.m.

11695 Medlock Bridge Road  
Johns Creek, Georgia

Debra R. Luther, RMR, CRR, CCR-B-881

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Johnson & Johnson Consumer, Inc.:

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1 APPEARANCES OF COUNSEL BY PHONE (Continued)

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5 successor-in-interest to Longs Drug Stores, LLC,  
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1 direction or another?

2 **A. I don't recall. I haven't done PLM in**  
3 **such a long time.**

4 Q. Who are you relying upon in your  
5 laboratory to do the PLM analysis?

6 **A. We have a couple people that do it.**

7 Q. Who are they?

8 **A. Paul Hess is one, Bill Egeland is one.**  
9 **Those are the two -- those are the two primary people**  
10 **who do it.**

11 Q. Would Mr. Hess know what particles would  
12 show a parallel extinction?

13 **A. He may know all of them. If we just go**  
14 **to, you know, the parallel extinction for tremolite**  
15 **oblique, I think they call it, and then if you go to**  
16 **ones with the anthophyllite, it will tell you what**  
17 **the parallel extinction is for that.**

18 Q. Does tremolite ever show parallel  
19 extinction?

20 **A. I don't think so. And again, it's been a**  
21 **while since I've done this. The next time we talk I**  
22 **can explain it all for you in more detail.**

23 Q. Would there be a difference between  
24 asbestiform and nonasbestiform tremolite as it  
25 pertains to extinction angles?


C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF GWINNETT:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 172 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 18th day of September 2018.

  
DEBRA R. LUTHER, B-881  
Georgia Certified Court Reporter

